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December 16, 2005

BY ELECTRONIC FILING

The Honorable Kent A. Jordan
U.S. District Court, District of Delaware
844 N. King Street
Wilmington, DE 19801

Re: *Honeywell International Inc., et al. v. Apple Computer, Inc., et al.*
C.A. No. 04-1338-KAJ

Dear Judge Jordan:

I am writing to provide the Court with background information about why Honeywell filed a separate complaint today against Citizen Watch Co., Ltd. and Citizen Displays Co. Ltd. (the "Citizen complaint"). Because the complaint involves the same patents as, and therefore is related to, C.A. No. 04-1338, we anticipate that the Citizen complaint will be assigned to Your Honor.

The Citizen complaint names two Citizen entities that were identified by one of the defendants in the 04-1338 case, but not until November 29, 2005, which was after the Court's November 7 deadline for Honeywell to amend its complaint (D.I. 237 at 5).¹ Therefore, these Citizen entities were not named in the First Amended Complaint. However, because the First Amended Complaint did name two other Citizen entities, we inquired of Citizen whether it would consent to the addition or substitution of the two newly identified Citizen entities to C.A. No. 04-1338 and whether it would waive formal service in exchange for a 90-day extension to respond. Citizen has not agreed to these requests.

¹ The identity of the two Citizen entities was provided to Honeywell's counsel on November 29, 2005 by letter marked confidential under D. Del. LR 26.2. We have not, therefore, attached that letter here, but are happy to provide it to the Court for its review.

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As a result, we thought the most efficient way to proceed was to file a separate complaint naming the two new Citizen entities and, at the appropriate time, move to consolidate the Citizen complaint with the 04-1338 case.

Respectfully,

A handwritten signature in black ink, appearing to read "Thomas C. Grimm". The signature is fluid and cursive, with a long horizontal stroke at the end.

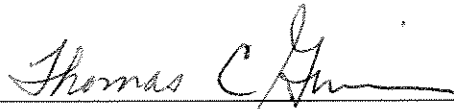
Thomas C. Grimm (#1098)

TCG

cc: Dr. Peter T. Dalleo, Clerk of the Court (via hand delivery)
Electronic Mail Notice List for C.A. No. 04-1338 (via CM/ECF)

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2005, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Christopher E. Chalsen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Amy Elizabeth Evans, York M. Faulkner, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Richard L. Horwitz, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, David Ellis Moore, Arthur I. Neustadt, Elizabeth A. Niemeyer, Gerard M. O'Rourke, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, Steven J. Rizzi, Avelyn M. Ross, Philip A. Rovner, Carl E. Schlier, Chad Michael Shandler, John W. Shaw, William J. Wade, Roderick B. Williams and Edward R. Yoches.

A handwritten signature in cursive script, appearing to read "Thomas C. Grimm", is written over a horizontal line.

Thomas C. Grimm (#1098)